

# **PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT**

**BTR Antivibration Systems, Incorporated  
One General Street  
Logansport, Indiana 46947**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T017-7639-00014	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

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## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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The Permittee owns and operates a stationary fabricated rubber products manufacturing operation.

Responsible Official: Gregory K. Finch  
Source Address: One General Street, Logansport, Indiana 46947  
Mailing Address: P.O. Box 7007, Logansport, Indiana 46947-7007  
Phone Number: 219-434-9800  
SIC Code: 3069  
County Location: Cass  
County Status: Attainment for all criteria pollutants  
Source Status: Part 70 Permit Program  
Minor Source, under PSD Rules;  
Major Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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This stationary source consists of the following emission units and pollution control devices:

- (1) One (1) High Volume, Low Pressure (HVLP) spray coating line, identified as EU-001, constructed prior to August 1973, with maximum capacity of 2,500 rubber and metal components per hour, using dry filters for particulate matter control, exhausting to two (2) stacks (S38 and S42);
- (2) One (1) High Volume, Low Pressure (HVLP) spray coating line, identified as EU-002, constructed in March 1973, with maximum capacity of 2,000 rubber/metal parts per hour, using dry mat filters for particulate matter control, exhausting to three (3) stacks (S164, S44 and S45);
- (3) One (1) natural gas or fuel oil #2 fired boiler, identified as EU-003, constructed in 1999, with maximum heat input capacity of 16.74 million British thermal units per hour (mmBtu/hr), exhausting to one (1) stack (S50);
- (4) One (1) natural gas or fuel oil #2 fired boiler, identified as EU-004, constructed in March 1996, with maximum heat input capacity of 16.74 million British thermal units per hour (mmBtu/hr), exhausting to one (1) stack (S24);
- (5) One (1) High Volume, Low Pressure (HVLP) spray coating line, identified as EU-006, constructed in 1994, with maximum capacity of 3,300 rubber/metal parts per hour, using dry filters for particulate matter control, exhausting to one (1) stack (S61);
- (6) One (1) High Volume, Low Pressure (HVLP) spray coating line, identified as EU-007, constructed in 1970, with maximum capacity of 1,600 parts per hour, using dry filters for particulate matter control, exhausting to one (1) stack (S60);
- (7) One (1) dip coating line, identified as EU-008, constructed in 1970, with maximum capacity of 8,000 parts per hour, exhausting to two (2) stacks (S115 and S116);

- (8) One (1) rollcoating operation, identified as EU-012, constructed in 1991, with maximum capacity of 3,000 rubber/metal parts per hour, exhausting to one (1) stack (S113);
- (9) One (1) airless spray coating line, identified as EU-013, constructed in 1990, with maximum capacity of 400 metal components per hour, using dry filters for particulate matter control, exhausting to two (2) stacks (S138 and S154);
- (10) One (1) rollcoating operation, identified as EU-015, constructed in 1990, with maximum capacity of 174 metal components per hour, exhausting to one (1) stack (S139);
- (11) One (1) rollcoating operation, identified as EU-016, constructed in 1993, with maximum capacity of 174 metal components per hour, exhausting to one (1) stack (S141);
- (12) One (1) High Volume, Low Pressure (HVLP) spray coating line, identified as EU-017, constructed in 1990, with maximum capacity of 448 metal components per hour, using dry filters for particulate matter control, exhausting to one (1) stack (S140);
- (13) One (1) dip coating operation, identified as EU-018, constructed in 1990, with maximum capacity of 400 metal and rubber parts per hour, exhausting to one (1) stack (S141);
- (14) One (1) High Volume, Low Pressure (HVLP) spray coating line, identified as EU-019, constructed in 1990, with maximum capacity of 174 metal components per hour, using dry filters for particulate matter control, exhausting to one (1) stack (S142);
- (15) One (1) dip coating operation, identified as EU-020, constructed in 1993, with maximum capacity of 400 metal and rubber parts per hour, exhausting to two (2) stacks (S152 and S153);
- (16) One (1) airless spray coating line, identified as EU-022, constructed in 1993, with maximum capacity of 400 metal components per hour, using dry filters for particulate matter control, exhausting to two (2) stacks (S160 and S161);
- (17) One (1) air atomization spray coating line, identified as EU-024, constructed in 1993, with maximum capacity of 400 metal and rubber parts per hour, using dry filters for particulate matter control, exhausting to two (2) stacks (S166 and S162); and
- (18) One (1) pyrolytic oven, with a heat input of 0.3 million British thermal units per hour (mmBtu/hr), and is capable of burning 10.0 pounds of waste per hour.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(15)]

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This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (1) One (1) 5.23 natural gas fired boiler, constructed in March 1993;
- (2) Seventeen (17) welding stations, each with maximum capacity of 6 pounds of wire per hour;
- (3) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment;

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## GENERAL CONDITIONS

(a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.

- Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

(a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.

- The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

This permit does not convey any property rights of any sort, or any exclusive privilege.

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015



- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; or
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was based on continuous or intermittent data;
  - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
  - (5) Any insignificant activity that has been added without a permit revision;
  - (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]  
[326 IAC 1-6-3]

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
    - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
    - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
    - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM.

**B.13 Emergency Provisions [326 IAC 2-7-16]**

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management,  
Compliance Section), or  
Telephone Number: 317-233-5674 (ask for Compliance Section)  
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

**B.14 Permit Shield [326 IAC 2-7-15]**

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- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
  - (1) The applicable requirements are included and specifically identified in this permit; or
  - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.

- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM has issued the modification. [326 IAC 2-7-12(b)(7)]

**B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]**

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Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

**B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

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- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
- (2) An emergency as defined in 326 IAC 2-7-1(12); or
- (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

**B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination**  
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

**B.18 Permit Renewal** [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
- (1) A timely renewal application is one that is:
- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.
- (2) If IDEM, OAM upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]  
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]  
If IDEM, OAM fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

**B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]**

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]  
[326 IAC 2-7-12 (b)(2)]

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- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
  
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

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The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
  
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590



in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
  - (1) A brief description of the change within the source;
  - (2) The date on which the change will occur;
  - (3) Any change in emissions; and
  - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

**B.23 Construction Permit Requirement [326 IAC 2]**

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

**B.24 Inspection and Entry [326 IAC 2-7-6(2)]**

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.  
[326 IAC 2-7-6(6)]
  - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM nor an authorized representative, may disclose the information unless and until IDEM, OAM makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
  - (2) The Permittee, and IDEM, OAM acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

**B.25 Transfer of Ownership or Operational Control [326 IAC 2-7-11]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request.  
[326 IAC 2-7-11(c)(3)]

**B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]**

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- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.

- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source
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### Emission Limitations and Standards [326 IAC 2-7-5(1)]

- C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]  
Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- C.2 Opacity [326 IAC 5-1]  
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:
- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six minute averaging period, as determined in 326 IAC 5-1-4.
  - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]  
The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.
- C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]  
The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.
- C.5 Fugitive Dust Emissions [326 IAC 6-4]  
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.
- C.6 Operation of Equipment [326 IAC 2-7-6(6)]  
All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.
- C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]  
(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control  
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Indiana Accredited Asbestos Inspector  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

#### **Testing Requirements [326 IAC 2-7-6(1)]**

##### **C.8 Performance Testing [326 IAC 3-6]**

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### **Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

##### **C.9 Compliance Schedule [326 IAC 2-7-6(3)]**

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The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

##### **C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend the compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

##### **C.11 Monitoring Methods [326 IAC 3]**

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Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

**C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAM the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

**C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]**

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If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
- (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
  - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
  - (3) A verification to IDEM, OAM that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**C.14 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]**

- 
- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
- (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this permit;
  - (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
    - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
    - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
  - (3) An automatic measurement was taken when the process was not operating; or
  - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.



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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

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**C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]**

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
- (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
  - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:
- Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.

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**C.17 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]**

- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

**C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]**

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- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM representative, for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or local agency within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this permit;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;

- (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

## **Stratospheric Ozone Protection**

### **C.20 Compliance with 40 CFR 82 and 326 IAC 22-1**

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Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

One (1) High Volume, Low Pressure (HVLP) spray coating line, identified as EU-001, constructed prior to August 1973, with maximum capacity of 2,500 rubber and metal components per hour, using dry filters for particulate matter control, exhausting to two (2) stacks (S38 and S42);

One (1) High Volume, Low Pressure (HVLP) spray coating line, identified as EU-002, constructed in March 1973, with maximum capacity of 2,000 rubber/metal parts per hour, using dry mat filters for particulate matter control, exhausting to three (3) stacks (S164, S44 and S45);

One (1) High Volume, Low Pressure (HVLP) spray coating line, identified as EU-006, constructed in 1994, with maximum capacity of 3,300 rubber/metal parts per hour, using dry filters for particulate matter control, exhausting to one (1) stack (S61);

One (1) High Volume, Low Pressure (HVLP) spray coating line, identified as EU-007, constructed in 1970, with maximum capacity of 1,600 parts per hour, using dry filters for particulate matter control, exhausting to one (1) stack (S60);

One (1) dip coating line, identified as EU-008, constructed in 1970, with maximum capacity of 8,000 parts per hour, exhausting to two (2) stacks (S115 and S116);

One (1) rollcoating operation, identified as EU-012, constructed in 1991, with maximum capacity of 3,000 rubber/metal parts per hour, exhausting to one (1) stack (S113);

One (1) airless spray coating line, identified as EU-013, constructed in 1990, with maximum capacity of 400 metal components per hour, using dry filters for particulate matter control, exhausting to two (2) stacks (S138 and S154);

One (1) rollcoating operation, identified as EU-015, constructed in 1990, with maximum capacity of 174 metal components per hour, exhausting to one (1) stack (S139);

One (1) rollcoating operation, identified as EU-016, constructed in 1993, with maximum capacity of 174 metal components per hour, exhausting to one (1) stack (S141);

One (1) High Volume, Low Pressure (HVLP) spray coating line, identified as EU-017, constructed in 1990, with maximum capacity of 448 metal components per hour, using dry filters for particulate matter control, exhausting to one (1) stack (S140);

One (1) dip coating operation, identified as EU-018, constructed in 1990, with maximum capacity of 400 metal and rubber parts per hour, exhausting to one (1) stack (S141)

One (1) High Volume, Low Pressure (HVLP) spray coating line, identified as EU-019, constructed in 1990, with maximum capacity of 174 metal components per hour, using dry filters for particulate matter control, exhausting to one (1) stack (S142);

One (1) dip coating operation, identified as EU-020, constructed in 1993, with maximum capacity of 400 metal and rubber parts per hour, exhausting to two (2) stacks (S152 and S153);

One (1) airless spray coating line, identified as EU-022, constructed in 1993, with maximum capacity of 400 metal components per hour, using dry filters for particulate matter control, exhausting to two (2) stacks (S160 and S161);

One (1) air atomization spray coating line, identified as EU-024, constructed in 1993, with maximum capacity of 400 metal and rubber parts per hour, using dry filters for particulate matter control, exhausting to two (2) stacks (S166 and S162);

## **Emission Limitations and Standards [326 IAC 2-7-5(1)]**

### **D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]**

Any change or modification to the three (3) HVLP spray coating lines (EU-006, EU-017 and EU-019), the three (3) rollcoating operations (EU-012, EU-015, and EU-016), the two (2) airless spray coating lines (EU-013 and EU-022), the one (1) dip coating operation (EU-020) and the one (1) air atomization spray coating line (EU-024) that would increase the potential to emit to greater than twenty-five (25) tons per year from any facility would make that facility subject to the requirements of 326 IAC 8-1-6 (General Reduction Requirements).

### **D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]**

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), the Volatile Organic Compound (VOC) from all the coating facilities at the source shall be limited to less than 245 tons (this includes VOC from coatings, dilution solvents, and cleaning solvents), per 12 consecutive month period, rolled on a monthly basis. This usage limit is required to limit the potential to emit of VOC to less than 250 tons per 12 consecutive month period, rolled on a monthly basis for the entire source (five (5) tons have been allotted to the insignificant activities). Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

### **D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]**

Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate matter (PM) from the six (6) HVLP spray coating lines (EU-001, EU-002, EU-006, EU-007, EU-017, EU-019), the two (2) airless spray coating lines (EU-103 and EU-022), and the one (1) air atomization spray coating line (EU-024) shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

### **D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

## **Compliance Determination Requirements**

### **D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]**

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Volatile Organic Compound (VOC) or Particulate Matter (PM) limits specified in Conditions D.1.2 or D.1.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

### **D.1.6 Volatile Organic Compounds (VOC)**

Compliance with the VOC content and usage limitations contained in Conditions D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

### **D.1.7 VOC Emissions**

Compliance with Condition D.1.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

## **Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

### **D.1.8 Particulate Matter (PM)**

The dry filters shall be in operation at all times the six (6) HVLP spray coating lines (EU-001, EU-002, EU-006, EU-007, EU-017, EU-019), the two (2) airless spray coating lines (EU-103 and EU-022), and the one (1) air atomization spray coating line (EU-024) are in operation, in order to comply with this limit.

### **D.1.9 Monitoring**

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (S42, S44, S61, S60, S138, S154, S140, S142, S160, S161, and S166) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

## **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

### **D.1.10 Record Keeping Requirements**

- (a) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.2.
  - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The cleanup solvent usage for each month;
  - (4) The total VOC usage for each day month; and
  - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.



## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

One (1) natural gas or fuel oil #2 fired boiler, identified as EU-003, constructed in 1999, with maximum heat input capacity of 16.74 million British thermal units per hour (mmBtu/hr), exhausting to one (1) stack (S50);

One (1) natural gas or fuel oil #2 fired boiler, identified as EU-004, constructed in March 1996, with maximum heat input capacity of 16.74 million British thermal units per hour (mmBtu/hr), exhausting to one (1) stack (S24);

(Insignificant Activity) One (1) 5.23 natural gas fired boiler, constructed in March 1993;

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.2.1 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Emission Limitations for Facilities Specified in 326 IAC 6-2-1(d)):

- (a) The particulate matter emissions from the one (1) 5.23 mmBtu/hr boiler shall be limited to 0.60 pounds per million British thermal unit.
- (b) The particulate matter emissions from the one (1) boiler EU-004 shall be limited to 0.48 pounds per million British thermal unit.
- (c) The particulate matter emissions from the one (1) boiler EU-003 shall be limited to 0.42 pounds per million British thermal unit.

This limitation was established from the following equation:

$$Pt = 1.09 / Q^{0.26}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu heat input (lb/mmBtu).

Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's operation permit application, except when some lower capacity is contained in the facility's operation permit; in which case the capacity specified in the operation permit shall be used.

#### D.2.2 Sulfur Dioxide (SO<sub>2</sub>) [326 IAC 12] [40 CFR 60.40c, Subpart Dc]

Pursuant to 40 CFR 60.42c, the two (2) 16.74 mmBtu/hr boilers when burning fuel oil #2 shall not combust oil that contains greater than 0.5 weight percent sulfur.

### Compliance Determination Requirements

#### D.2.3 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Particulate Matter (PM) and Sulfur Dioxide limits specified in Conditions D.2.1 and D.2.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

## **Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

### **D.2.4 Visible Emissions Notations**

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- (a) Daily visible emission notations of the four (4) boiler stack exhausts shall be performed during normal daylight operations when using fuel oil # 2 and exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

## **Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

### **D.2.5 Record Keeping Requirements**

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- (a) To document compliance with Condition D.2.4, the Permittee shall maintain records of daily visible emission notations of the two (2) boilers, EU-003 and EU-004, stack exhaust when using fuel oil #2.
- (b) To document compliance with Condition D.2.2, the Permittee shall record and maintain records of the amounts of fuel combusted during each day for a period of two years following the date of such record for the two (2) boilers, EU-003 and EU-004.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### **D.2.6 Reporting Requirements**

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- (a) Natural Gas Fired Boiler Certification: A quarterly certification shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the Natural Gas Fired Boiler Certification form located at the end of this permit, or its equivalent, no later than thirty (30) days after the end of the quarter being reported.
- (b) To document compliance with Condition D.2.2, the Permittee shall submit quarterly reports to the address listed in Section C - General Reporting Requirements, of this permit, within thirty (30) days after the end of the quarter being reported. The reports shall include the following information for fuel oil #2 usage:
  - (1) A certified statement signed by the Permittee that the records of fuel oil #2 supplier certifications represent all of the fuel oil combusted during the quarter.
  - (2) The name of the fuel oil #2 supplier.
  - (3) A statement from the fuel oil #2 supplier that the oil complies with the 0.5 weight percent sulfur limitation.

## **SECTION D.3 FACILITY OPERATION CONDITIONS**

### **Facility Description [326 IAC 2-7-5(15)]**

One (1) pyrolytic oven, with a heat input of 0.3 million British thermal units per hour (mmBtu/hr), and is capable of burning 10.0 pounds of waste per hour.

### **Emission Limitations and Standards [326 IAC 2-7-5(1)]**

#### **D.3.1 Incinerators [326 IAC 4-2-2]**

Pursuant to 326 IAC 4-2-2 (Incinerators), the 0.3 mmBtu/hr pyrolytic oven, rated at 10 pounds of waste per hour shall:

- (a) Consist of primary and secondary chambers or the equivalent.
- (b) Be equipped with a primary burner unless burning wood products.
- (c) Comply with 326 IAC 5-1 (Opacity Limitations) and 326 IAC 2 (Permit Review Rules).
- (d) Be maintained properly as specified by the manufacturer and approved by IDEM.
- (e) Be operated according to the manufacturer's recommendation and only burn waste approved by IDEM.
- (f) Comply with other state and/or local rules or ordinances regarding installation and operation of incinerators.
- (g) Be operated so that emissions of hazardous material including, but not limited to, viable pathogenic bacteria, dangerous chemical or gases, or noxious odors are prevented.
- (h) Not create a nuisance or a fire hazard.
- (i) Not emit particulate matter (PM) in excess of 0.5 pounds per 1000 pounds of dry exhaust gas corrected to 50% excess air.

The operation of this incinerator shall be terminated immediately upon noncompliance with any of the above mentioned requirements.

### **Compliance Determination Requirements**

#### **D.3.2 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]**

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

### **Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

#### **D.3.3 Monitoring**

Monitoring of this facility is not specifically required by this permit. However, any change or modification to this facility, as specified in 326 IAC 2-1, may require this facility to have monitoring requirements.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: BTR Antivibration Systems, Incorporated  
Source Address: One General Street, Logansport, Indiana 46947  
Mailing Address: P.O. Box 7007, Logansport, Indiana 46947-7007  
Part 70 Permit No.: T017-7639-00014

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION  
P.O. Box 6015  
100 North Senate Avenue  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT  
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: BTR Antivibration Systems, Incorporated  
Source Address: One General Street, Logansport, Indiana 46947  
Mailing Address: P.O. Box 7007, Logansport, Indiana 46947-7007  
Part 70 Permit No.: T017-7639-00014

**This form consists of 2 pages**

**Page 1 of 2**

Check either No. 1 or No.2

- 9** 1. This is an emergency as defined in 326 IAC 2-7-1(12)  
C The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and  
C The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
- 9** 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c)  
C The Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency/Deviation:

Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

**Page 2 of 2**

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: BTR Antivibration Systems, Incorporated  
Source Address: One General Street, Logansport, Indiana 46947  
Mailing Address: P.O. Box 7007, Logansport, Indiana 46947-7007  
Part 70 Permit No.: T017-7639-00014

**This certification shall be included when submitting monitoring, testing reports/results  
or other documents as required by this permit.**

Report period

Beginning: \_\_\_\_\_

Ending: \_\_\_\_\_

Boiler Affected

Alternate Fuel

Days burning alternate fuel

From

To


I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature: \_\_\_\_\_

Printed Name: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION  
Part 70 Quarterly Report**

Source Name: BTR Antivibration Systems, Incorporated  
Source Address: One General Street, Logansport, Indiana 46947  
Mailing Address: P.O. Box 7007, Logansport, Indiana 46947-7007  
Part 70 Permit No.: T017-7639-00014  
Facility: All coating facilities  
Parameter: Volatile Organic Compound (VOC)  
Limit: The Volatile Organic Compound (VOC) from all the coating facilities at the source shall use less than 245 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period, rolled on a monthly basis. Five (5) tons have been attributed to insignificant facilities.

YEAR: \_\_\_\_\_

Month	Column 1		Column 2		Column 1 + Column 2	
	Spray Coating This Month	Dip Coating This Month	Spray Coating Previous 11 Months	Dip Coating Previous 11 Months	Spray Coating 12 Month Total	Dip Coating 12 Month Total
Month 1						
Month 2						
Month 3						

Month	Column 1		Column 2		Column 1 + Column 2	
	Roll Coating This Month	Solvent This Month	Roll Coating Previous 11 Months	Solvent Use Previous 11 Months	Roll Coating 12 Month Total	Solvent Use 12 Month Total
Month 1						
Month 2						
Month 3						

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**



**OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: BTR Antivibration Systems, Incorporated  
Source Address: One General Street, Logansport, Indiana 46947  
Mailing Address: P.O. Box 7007, Logansport, Indiana 46947-7007  
Part 70 Permit No.: T017-7639-00014

**Months:** \_\_\_\_\_ **to** \_\_\_\_\_ **Year:** \_\_\_\_\_

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

**9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD**

**9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.**

<b>Compliance Monitoring Requirement</b> (e.g. Permit Condition D.1.3)	<b>Number of Deviations</b>	<b>Date of each Deviation</b>

Form Completed By: \_\_\_\_\_  
Title/Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

## Indiana Department of Environmental Management Office of Air Management

### Addendum to the Technical Support Document for a Part 70 Operating Permit

Source Name: BTR Antivibration Systems, Inc.  
Source Location: One General Street, Logansport, IN 46947  
County: Cass  
SIC Code: 3069  
Operation Permit No.: T017-7639-00014  
Permit Reviewer: Holly M. Stockrahm

On May 14, 1999, the Office of Air Management (OAM) had a notice published in the Pharos Tribune, Logansport, Indiana, stating that BTR Antivibration Systems, Inc. had applied for a Part 70 Operating Permit to operate a fabricated rubber products manufacturing operation. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On June 15, 1999, BTR Antivibration Systems, Inc. submitted comments on the proposed Part 70 permit. The source has submitted the following comments (~~strikeout~~ added to show what was deleted and **bold** added to show what was added). The summary of the comments is as follows:

#### Comment 1:

Please remove Condition D.1.4 Preventive Maintenance Plan in its entirety. There is no air emission control equipment present of these processes. The application for this permit and CP 103-9550 rigorously showed that the dry filters that are present are not required to comply with the applicable particulate control rule as described in Condition D.1.3. The dry filters are in fact fire prevention measures. 326 IAC 2-7-15(13) refers to 326 IAC 2-7-4(c)(9) which in turn refers to 326 IAC 1-6-3 which refers to *"inspecting, maintaining, and repairing emission control devices."* Since there are no emission control devices present, there can be no justification for the requirement of a preventive maintenance Plan.

#### Response to Comment 1:

Complying with the requirements of 326 IAC 6-3-2 can be especially variable for spray coating booths. The actual substrate being coated and the solids content of the coating being used can affect the process weight rate, the gallons or pounds of solids used, transfer efficiency, or other factors that directly affect actual, allowable, or potential emissions. While permit applications contain representative information regarding these factors, relying on this information as an ongoing demonstration of compliance is difficult if the factors are not themselves enforceable. The OAM does not believe that it would be generally advisable to include these factors as permit conditions, to make them enforceable or to presume that they are so fixed they define a source's potential emissions because either could severely limit a source's operational flexibility. Properly operating the air pollution controls (in this case, the dry filters) that are already in place is generally adequate to demonstrate compliance with 326 IAC 6-3 in lieu of a stack test and also assures compliance with applicable rules limiting fugitive dust, opacity, and (when necessary) Potential to Emit. This comment effects no change to the permit.

**Comment 2:**

Please delete Condition D.1.8 Particulate Matter in its entirety. The application showed that these processes comply with the particulate rule cited in Condition D.1.3 without the benefit of any emission control devices. Therefore, there is no justification for requiring that these filters be in operation to comply with Condition D.1.3.

**Response to Comment 2:**

IDEM, OAM, does not agree. Please see Response to Comment 1. This comment effects no change to the permit.

**Comment 3:**

Please delete Condition D.1.9(a) Monitoring in its entirety. As has previously been shown, the operation of the filters is irrelevant to compliance with Condition D.1.3 and 326 IAC 6-3. Therefore, there can be no justification for any requirement for inspections of these filters.

**Response to Comment 3:**

IDEM, OAM, does not agree. Please see Response to Comment 1. This comment effects no change to the permit.

**Comment 4:**

Please delete Condition D.1.9(b) Monitoring in its entirety. Condition D.1.3 and 326 IAC 6-3-2 allow these processes to emit a mass of particulate as limited by the condition and the rule. The thrust of this condition is to demand zero emissions, and that is in variance to the rule. Even in the shortest month of the year, there are 672 hours in a month. If a process were emitting a compliant mass of particulate, the chances are that some will deposit on the roof or the ground. It takes only a minuscule amount of coating to indicate a "presence." Since this condition is at odds with the applicable rule, 326 IAC 2-7-6(1) do not provide any justification for this condition.

**Response to Comment 4:**

IDEM, OAM, does not agree. The permittee's inspections of the equipment may show that the equipment was not operating in its normal range, not zero emissions, but with a noticeable change in emissions which could indicate the need for maintenance. This comment effects no change to the permit.

**Comment 5:**

Please delete Condition D.1.9(c) Monitoring in its entirety. As the preventive maintenance plan was discredited earlier, there is no justification for referring to preventive maintenance plan that has no justification for existence.

**Response to Comment 5:**

IDEM, OAM, does not agree. Please see Response to Comment 1. This comment effects no change to the permit.

**Comment 6:**

Please delete Condition D.1.10(a) Record Keeping in its entirety. As previous comments showed that the monitoring requirements are not required, the recordkeeping requirements are unjustified as well.

**Response to Comment 6:**

IDEM, OAM, does not agree. Please see Response to Comment 1. This comment effects no change to the permit.

## Indiana Department of Environmental Management Office of Air Management

### Technical Support Document (TSD) for a Part 70 Operating Permit

#### Source Background and Description

**Source Name:** BTR Antivibration Systems, Incorporated  
**Source Location:** One General Street, Logansport, Indiana 46947  
**County:** Cass  
**SIC Code:** 3069  
**Operation Permit No.:** T017-7639-00014  
**Permit Reviewer:** Holly M. Stockrahm

The Office of Air Management (OAM) has reviewed a Part 70 permit application from BTR Antivibration Systems, Incorporated relating to the operation of fabricated rubber products manufacturing operation.

#### Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (1) One (1) High Volume, Low Pressure (HVLP) spray coating line, identified as EU-001, constructed prior to August 1973, with maximum capacity of 2,500 rubber and metal components per hour, using dry filters for particulate matter control, exhausting to two (2) stacks (S38 and S42);
- (2) One (1) High Volume, Low Pressure (HVLP) spray coating line, identified as EU-002, constructed in March 1973, with maximum capacity of 2,000 rubber/metal parts per hour, using dry mat filters for particulate matter control, exhausting to three (3) stacks (S164, S44 and S45);
- (3) One (1) natural gas or fuel oil #2 fired boiler, identified as EU-003, constructed in 1999, with maximum heat input capacity of 16.74 million British thermal units per hour (MMBtu/hr), exhausting to one (1) stack (S50);
- (4) One (1) natural gas or fuel oil #2 fired boiler, identified as EU-004, constructed in March 1996, with maximum heat input capacity of 16.74 million British thermal units per hour (MMBtu/hr), exhausting to one (1) stack (S24);
- (5) One (1) High Volume, Low Pressure (HVLP) spray coating line, identified as EU-006, constructed in 1994, with maximum capacity of 3,300 rubber/metal parts per hour, using dry filters for particulate matter control, exhausting to one (1) stack (S61);
- (6) One (1) High Volume, Low Pressure (HVLP) spray coating line, identified as EU-007, constructed in 1970, with maximum capacity of 1,600 parts per hour, using dry filters for particulate matter control, exhausting to one (1) stack (S60);
- (7) One (1) dip coating line, identified as EU-008, constructed in 1970, with maximum capacity of 8,000 parts per hour, exhausting to two (2) stacks (S115 and S116);
- (8) One (1) rollcoating operation, identified as EU-012, constructed in 1991, with maximum capacity of 3,000 rubber/metal parts per hour, exhausting to one (1) stack (S113);
- (9) One (1) airless spray coating line, identified as EU-013, constructed in 1990, with maximum capacity of 400 metal components per hour, using dry filters for particulate matter control, exhausting to two (2) stacks (S138 and S154);

- (10) One (1) rollcoating operation, identified as EU-015, constructed in 1990, with maximum capacity of 174 metal components per hour, exhausting to one (1) stack (S139);
- (11) One (1) rollcoating operation, identified as EU-016, constructed in 1993, with maximum capacity of 174 metal components per hour, exhausting to one (1) stack (S141);
- (12) One (1) High Volume, Low Pressure (HVLP) spray coating line, identified as EU-017, constructed in 1990, with maximum capacity of 448 metal components per hour, using dry filters for particulate matter control, exhausting to one (1) stack (S140);
- (13) One (1) dip coating operation, identified as EU-018, constructed in 1990, with maximum capacity of 400 metal and rubber parts per hour, exhausting to one (1) stack (S141);
- (14) One (1) High Volume, Low Pressure (HVLP) spray coating line, identified as EU-019, constructed in 1990, with maximum capacity of 174 metal components per hour, using dry filters for particulate matter control, exhausting to one (1) stack (S142);
- (15) One (1) dip coating operation, identified as EU-020, constructed in 1993, with maximum capacity of 400 metal and rubber parts per hour, exhausting to two (2) stacks (S152 and S153);
- (16) One (1) airless spray coating line, identified as EU-022, constructed in 1993, with maximum capacity of 400 metal components per hour, using dry filters for particulate matter control, exhausting to two (2) stacks (S160 and S161);
- (17) One (1) air atomization spray coating line, identified as EU-024, constructed in 1993, with maximum capacity of 400 metal and rubber parts per hour, using dry filters for particulate matter control, exhausting to two (2) stacks (S166 and S162); and
- (18) One (1) pyrolytic oven, with a heat input of 0.3 million British thermal units per hour (MMBtu/hr), and is capable of burning 10.0 pounds of waste per hour.

#### **Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR**

There are no unpermitted facilities operating at this source during this review process.

#### **Insignificant Activities**

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (1) One (1) 5.23 natural gas fired boiler, constructed in March 1993;
- (2) One (1) rotary rubber molding press identified as Desma Rotary Press, with a manual rubber component assembly area for the surface coating of rubber moldings, identified as Fisher-Guide Line. The Desma Rotary Press has a capacity of 60 pounds of uncured rubber per hour. The Fisher-Guide Line is capable of coating a maximum of 585 rubber parts per hour;
- (3) One (1) rubber extruder, which has a capacity of 1,290 pounds of uncured rubber per hour;
- (4) Two (2) rubber molding platen presses, each having a capacity of 344 pounds per hour;
- (5) One (1) Dock Bumper platen press, with a capacity of 344 pounds per hour;
- (6) Eight (8) 300 ton rubber injection molding presses, each with a capacity of 53 pounds per hour;

- (7) Two (2) natural gas-fired air make up units, one (1) has a heat input capacity of 5.0 million British thermal units per hour (MMBtu/hr), and the other has a heat input capacity of 4.4 million British thermal units per hour (MMBtu/hr);
- (8) Seventeen (17) welding stations, each with maximum capacity of 6 pounds of wire per hour;
- (9) Sixty (60) injection molding platen presses, each with maximum capacity of 52.5 pounds per hour;
- (10) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour;
- (11) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour;
- (12) Combustion source flame safety purging on startup;
- (13) VOC and HAP storage vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (14) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings;
- (15) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment;
- (16) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume;
- (17) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs;
- (18) Heat exchanger cleaning and repair;
- (19) Paved and unpaved roads and parking lots with public access;
- (20) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process;
- (21) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment;
- (22) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower;
- (23) Filter or coalescer media changeout;
- (24) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kPa measured at 38 degrees C; and
- (25) A laboratory as defined in 326 IAC 2-7-1(21)(D).

## Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (1) Registration (no number), issued June, 16, 1989.
- (2) Exemption (no number), issued August 7, 1989.
- (3) Operation Permit (OP 09-10-93-0171), issued December 28, 1989.
- (4) Registration (no number), issued April 5, 1990.
- (5) Registration (no number), issued February 5, 1991, amended December 12, 1991.
- (6) Exemption (CP 017-2343-00014), issued March 3, 1993.
- (7) Exemption (CP 017-3188-00014), issued September 3, 1993.
- (8) Registration (CP 017-3187-00014), issued November 2, 1993.
- (9) Registration (CP 017-3312-00014), issued December 29, 1993.
- (10) Exemption (CP 017-3532-00014), issued March 21, 1994.
- (11) Exemption (CP 017-3634-00014), issued April 12, 1994.
- (12) Exemption (CP 017-4003-00014), issued August 16, 1994.
- (13) Exemption (CP 017-4401-00014), issued March 10, 1995.
- (14) Exemption (CP 017-4721-00014), issued September 19, 1995.
- (15) Exemption (CP 017-4949-00014), issued December 7, 1995.
- (16) Exemption (CP 017-4998-00014), issued December 7, 1995, amended on January 17, 1996.
- (17) Amendment (A 017-5274-00014), issued February 12, 1996.
- (18) Registration (CP 017-8681-00014), issued August 4, 1997.
- (19) 1265 Exemption Qualification (EQ 017-9988-00014), issued December 10, 1998.

All conditions from previous approvals were incorporated into this Part 70 permit.

## Enforcement Issue

There are no enforcement actions pending.

## Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.



An administratively complete Part 70 permit application for the purposes of this review was received on December 13, 1996. Additional information was received on January 23, 1997.

A notice of completeness letter was mailed to the source on January 13, 1997.

## Emission Calculations

See Appendix A of this document for detailed emissions calculations (five (5) pages).

## Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

Pollutant	Potential Emissions (tons/year)
PM	less than 100
PM-10	less than 100
SO <sub>2</sub>	less than 100
VOC	greater than 250
CO	less than 100
NO <sub>x</sub>	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential Emissions (tons/year)
Xylene	greater than 10
Tetrachlorethylene	less than 10
Methyl Ethyl Ketone	less than 10
Triethylamine	less than 10
Methyl Isobutyl Ketone	greater than 10
Toluene	greater than 10
Ethyl Benzene	greater than 10
TOTAL	greater than 25

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of Volatile Organic Compound (VOC) is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

## Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1997 OAM emission data.

Pollutant	Actual Emissions (tons/year)
PM	0.000
PM-10	2.510
SO <sub>2</sub>	0.002
VOC	153.760
CO	0.000
NO <sub>x</sub>	0.250
HAP	not available

## County Attainment Status

The source is located in Cass County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Cass County has been designated as attainment or unclassifiable for ozone.

## Federal Rule Applicability

- (a) The one (1) 5.23 million British thermal units per hour (MMBtu/hr) natural gas fired boiler is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc), because the heat input capacity is less than 10 million British thermal units per hour (MMBtu/hr).
- (b) The two (2) 16.74 million British thermal units per hour (MMBtu/hr) natural gas fired boilers are subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc) because their heat input capacities are greater than 10 million British thermal units per hour (MMBtu/hr) and less than 100 million British thermal units per hour (MMBtu/hr).

Pursuant to 40 CFR 60.42c:

- (1) The two (2) 16.74 MMBtu/hr boilers when burning fuel oil #2 shall not combust oil that contains greater than 0.5 weight percent sulfur. The source uses fuel oil that contains 0.3 weight percent sulfur. Therefore, the two (2) boilers are in compliance with this requirement.
- (2) The two (2) 16.74 MMBtu/hr boilers are in compliance when using natural gas.

Pursuant to 40 CFR 60.48c (g), the Permittee shall submit quarterly reports of the following information for fuel oil #2 usage:

- (1) A certified statement signed by the Permittee that the records of fuel oil #2 supplier certifications represent all of the fuel oil combusted during the quarter.

- (2) The name of the fuel oil #2 supplier.
- (3) A statement from the fuel oil #2 supplier that the oil complies with the 0.5 weight percent sulfur limitation.

Pursuant to 40 CFR 60.48c, the Permittee shall record and maintain records of the amounts of fuel combusted during each day for a period of two years following the date of such record for the two (2) boilers.

- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) applicable to this source.

#### **State Rule Applicability - Entire Source**

##### **326 IAC 2-2 (Prevention of Significant Deterioration)**

All of the coating facilities at this source shall use less than 250 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

##### **326 IAC 2-6 (Emission Reporting)**

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of Volatile Organic Compound (VOC). Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

##### **326 IAC 5-1 (Opacity Limitations)**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six minute averaging period, as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

#### **State Rule Applicability - Individual Facilities**

##### **326 IAC 8-1-6 (General Reduction Requirements)**

- (a) The three (3) HVLP spray coating lines (EU-001, EU-002 and EU-007) and the one (1) dip coating line (EU-008) are not subject to the requirements of 326 IAC 8-1-6 (General Reduction Requirements) because they were constructed before January 1, 1980.
- (b) The three (3) HVLP spray coating lines (EU-006, EU-017 and EU-019), the three (3) rollcoating operations (EU-012, EU-015, and EU-016), the two (2) airless spray coating lines (EU-013 and EU-022), the one (1) dip coating operation (EU-020) and the one (1) air atomization spray coating line (EU-024) are not subject to the requirements of 326 IAC 8-1-6 (General Reduction Requirements) because the potential to emit Volatile Organic Compound (VOC) from each facility is less than twenty-five (25) tons per year. Any change or modification that would increase the potential to emit to greater than twenty-five (25) tons per year from any facility would make that facility subject to the requirements of 326 IAC 8-1-6 (General Reduction Requirements).

326 IAC 8-2-9 (Miscellaneous Metal Parts)

This source has the SIC code 3069 which is exempt from the requirements of 326 IAC 8-2-9.

326 IAC 2-2 (Prevention of Significant Deterioration)

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), the Volatile Organic Compound (VOC) from all the coating facilities at the source shall be limited to less than 245 tons (this includes VOC from coatings, dilution solvents, and cleaning solvents), per 12 consecutive month period, rolled on a monthly basis. This usage limit is required to limit the potential to emit of VOC to less than 250 tons per 12 consecutive month period, rolled on a monthly basis for the entire source (five (5) tons have been allotted to the insignificant activities). Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

326 IAC 8-6 (Organic Solvent Emission Limitations)

None of the facilities located at this source are subject to the requirements of 326 IAC 8-6 (Organic Solvent Emission Limitations) because the source was constructed before October 7, 1974, which is the applicability date for Cass County.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

The two (2) 16.74 million British thermal units per hour (MMBtu/hr) boilers are not subject to the requirements of 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations) because the potential sulfur dioxide emissions are less than twenty-five (25) tons per year and less than ten (10) pounds per hour.

326 IAC 6-2-4 (Emission Limitations for Facilities Listed in 326 IAC 6-2-1(d))

The one (1) 5.23 million British thermal units per hour (MMBtu/hr) boiler and the two (2) 16.74 million British thermal units per hour (MMBtu/hr) boilers are subject to the requirements of 326 IAC 6-2-4 (Emission Limitations for Facilities Listed in 326 IAC 6-2-1(d)) because they were constructed after September 21, 1983.

Pursuant to 326 IAC 6-2-4 (Emission Limitations for Facilities Specified in 326 IAC 6-2-1(d)):

- (a) The particulate matter emissions from the one (1) 5.23 MMBtu/hr boiler shall be limited to 0.60 pounds per million British thermal unit.
- (b) The particulate matter emissions from the one (1) boiler EU-004 shall be limited to 0.48 pounds per million British thermal unit.
- (c) The particulate matter emissions from the one (1) boiler EU-003 shall be limited to 0.42 pounds per million British thermal unit.

This limitation was established from the following equation:

$$Pt = 1.09 / Q^{0.26}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu heat input (lb/MMBtu).

Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's operation permit application, except when some lower capacity is contained in the facility's operation permit; in which case the capacity specified in the operation permit shall be used.

- (1) For the 5.23 MMBtu/hr boiler:

$$Q = 5.23 \text{ MMBtu/hr}$$

$$Pt = 0.70 > 0.6. \text{ Therefore, the 5.23 MMBtu/hr boiler shall be limited to 0.6 lb/mmBtu.}$$

The 5.23 MMBtu/hr boiler is in compliance with this requirement when using natural gas by the following equation:

$$7.6 \text{ lb PM/MMCF} * \text{MMCF}/1,000 \text{ mmBtu} = 0.0076 \text{ lb PM/mmBtu} < 0.60 \text{ lb PM/mmBtu.}$$

Therefore, the boiler EU-004 is in compliance with this requirement when using natural gas.

- (2) For boiler EU-004:

$$Q = 5.23 + 16.74 = 21.97 \text{ MMBtu/hr}$$

$$Pt = 0.48 \text{ lb/mmBtu}$$

Boiler EU-004 is in compliance with this requirement when using natural gas by the following equation:

$$7.6 \text{ lb PM/MMCF} * \text{MMCF}/1,000 \text{ mmBtu} = 0.0076 \text{ lb PM/mmBtu} < 0.48 \text{ lb PM/mmBtu}$$

Therefore, the boiler EU-004 is in compliance with this requirement when using natural gas.

Boiler EU-004 is in compliance with this requirement when using fuel oil #2 by the following equation:

$$3.3 \text{ lb/kgal} * 1047.45 \text{ kgal/year} * \text{year}/8760 \text{ hours} * \text{hour}/16.74 \text{ mmBtu} = 0.023 \text{ lb PM/mmBtu} < 0.48 \text{ lb PM/mmBtu}$$

Therefore, the boiler EU-004 is in compliance with this requirement when using fuel oil #2.

- (3) For boiler EU-003:

$$Q = 5.23 + 16.74 + 16.74 = 38.71 \text{ MMBtu/hr}$$

$$Pt = 0.42 \text{ lb/mmBtu}$$

Boiler EU-003 is in compliance with this requirement when using natural gas by the following equation:

$$7.6 \text{ lb PM/MMCF} * \text{MMCF}/1,000 \text{ mmBtu} = 0.0076 \text{ lb PM/mmBtu} < 0.42 \text{ lb PM/mmBtu}$$

Therefore, the boiler EU-003 is in compliance with this requirement when using natural gas.

Boiler EU-003 is in compliance with this requirement when using fuel oil #2 by the following equation:

$$3.3 \text{ lb/kgal} * 1047.45 \text{ kgal/year} * \text{year}/8760 \text{ hours} * \text{hour}/16.74 \text{ mmBtu} = 0.023 \text{ lb PM/mmBtu} < 0.42 \text{ lb PM/mmBtu}$$

Therefore, the boiler EU-003 is in compliance with this requirement when using fuel oil #2.

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate matter (PM) from the six (6) HVLP spray coating lines (EU-001, EU-002, EU-006, EU-007, EU-017, EU-019), the two (2) airless spray coating lines (EU-103 and EU-022), and the one (1) air atomization spray coating line (EU-024) shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The dry filters shall be in operation at all times the six (6) HVLP spray coating lines (EU-001, EU-002, EU-006, EU-007, EU-017, EU-019), the two (2) airless spray coating lines (EU-103 and EU-022), and the one (1) air atomization spray coating line (EU-024) are in operation, in order to comply with this limit.

326 IAC 4-2-2 (Incinerators)

Pursuant to 326 IAC 4-2-2 (Incinerators), the 0.3 MMBtu/hr pyrolytic oven, rated at 10 pounds of waste per hour, shall:

- (a) Consist of primary and secondary chambers or the equivalent.
- (b) Be equipped with a primary burner unless burning wood products.
- (c) Comply with 326 IAC 5-1 (Opacity Limitations) and 326 IAC 2 (Permit Review Rules).
- (d) Be maintained properly as specified by the manufacturer and approved by IDEM.
- (e) Be operated according to the manufacturer's recommendation and only burn waste approved by IDEM.
- (f) Comply with other state and/or local rules or ordinances regarding installation and operation of incinerators.
- (g) Be operated so that emissions of hazardous material including, but not limited to, viable pathogenic bacteria, dangerous chemical or gases, or noxious odors are prevented.
- (h) Not create a nuisance or a fire hazard.
- (i) Not emit particulate matter (PM) in excess of 0.5 pounds per 1000 pounds of dry exhaust gas corrected to 50% excess air.

The operation of this incinerator shall be terminated immediately upon noncompliance with any of the above mentioned requirements.

This incinerator has a secondary chamber and the manufacturer's specifications show that the incinerator can comply with this limitation.

## Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The six (6) HVLP spray coating lines (EU-001, EU-002, EU-006, EU-007, EU-017, EU-019), the two (2) airless spray coating lines (EU-103 and EU-022), and the one (1) air atomization spray coating line (EU-024) have applicable compliance monitoring conditions as specified below:
  - (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (S42, S44, S61, S60, S138, S154, S140, S142, S160, S161, and S166) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
  - (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
  - (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters for the six (6) HVLP spray coating lines (EU-001, EU-002, EU-006, EU-007, EU-017, EU-019), the two (2) airless spray coating lines (EU-103 and EU-022), and the one (1) air atomization spray coating line (EU-024) must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

2. The two (2) 16.74 million British thermal units per hour (MMBtu/hr) boilers have applicable compliance monitoring conditions as specified below:

- (a) Daily visible emission notations of the four (4) boiler stack exhausts shall be performed during normal daylight operations when using fuel oil # 2 and exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

These monitoring conditions are necessary because the boilers must comply with 326 IAC 6-2-4 (Emission Limitations for Facilities Specified in 326 IAC 6-2-1(d)) and 326 IAC 2-7 (Part 70).

### **Air Toxic Emissions**

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the 1990 Clean Air Act Amendments.

### **Conclusion**

The operation of this fabricated rubber products manufacturing operation shall be subject to the conditions of the attached proposed **Part 70 Permit No. T017-7639-00014**.



**Appendix A: Emissions Calculations****Natural Gas Combustion Only****MM BTU/HR <100****Small Industrial Boiler****Company Name: BTR Antivibration Systems, Incorporated****Address City IN Zip: One General Street, Logansport, Indiana 46947****Part 70: T017-7639-00014****Plt ID: 017-00014****Reviewer: Catherine Moore****Date: January 20, 1999**Heat Input Capacity  
MMBtu/hrPotential Throughput  
MMCF/yr

38.2

334.4

Pollutant						
Emission Factor in lb/MMCF	PM 7.6	PM10 7.6	SO2 0.6	NOx 100.0 *see below	VOC 5.5	CO 84.0
Potential Emission in tons/yr	1.3	1.3	0.1	16.7	0.9	14.0

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

PM emission factors are condensable and filterable.

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 2 for HAPs emissions calculations.

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**Appendix A: Emissions Calculations****Natural Gas Combustion Only****MM BTU/HR <100****Small Industrial Boiler****HAPs Emissions****Company Name: BTR Antivibration Systems, Incorporated****Address City IN Zip: One General Street, Logansport, Indiana 46947****Part 70: T017-7639-00014****Plt ID: 017-00014****Reviewer: Catherine Moore****Date: January 20, 1999****HAPs - Organics**

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	3.511E-04	2.006E-04	1.254E-02	3.009E-01	5.684E-04

**HAPs - Metals**

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	8.359E-05	1.839E-04	2.341E-04	6.353E-05	3.511E-04

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations**  
**Industrial Boilers**  
**#1 and #2 Fuel Oil**

Page 3 of 5 TSD App A

**Company Name: BTR Antivibration Systems, Incorporated**  
**Address, City IN Zip: One General Street, Logansport, Indiana 46947**  
**Part 70: T017-7639-00014**  
**Plt ID: 017-00014**  
**Reviewer: Catherine Moore**  
**Date: January 20, 1999**

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
kgals/year

S = Weight % Sulfur

0.3

33.48

2094.891429

	Pollutant				
	PM	SO2	NOx	VOC	CO
Emission Factor in lb/kgal	3.3	42.6 (142.0S)	24.0	0.20	5.0
Potential Emission in tons/yr	3.5	44.6	25.1	0.2	5.2

**Methodology**

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu

Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-02-005-01/02/03) Supplement E 9/98

PM Emissions are Condensible and Filterable PM

Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton

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updated11/98

**Appendix A: Emissions Calculations****Industrial Boilers****#1 and #2 Fuel Oil****HAPs Emissions**

**Company Name:** BTR Antivibration Systems, Incorporated  
**Address, City IN Zip:** One General Street, Logansport, Indiana 46947  
**Part 70:** T017-7639-00014  
**Plt ID:** 017-00014  
**Reviewer:** Catherine Moore  
**Date:** January 20, 1999

**HAPs - Metals**

Emission Factor in lb/mmBtu	Arsenic 4.0E-06	Beryllium 3.0E-06	Cadmium 3.0E-06	Chromium 3.0E-06	Lead 9.0E-06
Potential Emission in tons/yr	5.866E-04	4.399E-04	4.399E-04	4.399E-04	1.320E-03

**HAPs - Metals (continued)**

Emission Factor in lb/mmBtu	Mercury 3.0E-06	Manganese 6.0E-06	Nickel 3.0E-06	Selenium 1.5E-05
Potential Emission in tons/yr	4.399E-04	8.799E-04	4.399E-04	2.200E-03

**Methodology**

No data was available in AP-42 for organic HAPs.

Potential Emissions (tons/year) = Throughput (mmBtu/hr)\*Emission Factor (lb/mmBtu)\*8,760 hrs/yr / 2,000 lb/ton

**Appendix A: Emissions Calculations  
VOC and Particulate  
From Surface Coating Operations**

**Company Name: BTR Antivibration Systems, Incorporated**  
**Address, City IN Zip: One General Street, Logansport, Indiana 46947**  
**Part 70: T017-7639-00014**  
**Plt ID: 017-00014**  
**Reviewer: Catherine Moore**  
**Date: January 20, 1999**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Lb VOC/gal solids	Transfer Efficiency
EU-001 (chemlok 6887-35)	8.1	76.70%	0.0%	76.7%	0.0%	13.90%	0.00170	2500.000	6.21	6.21	26.37	632.91	115.51	8.77	44.64	75%
EU-002 (chemlok 6887-35)	8.1	76.70%	0.0%	76.7%	0.0%	13.90%	0.00130	2000.000	6.21	6.21	16.13	387.19	70.66	5.37	44.64	75%
EU-006 (Carco ink SG1280)	9.2	80.00%	0.0%	80.0%	0.0%	18.00%	0.00010	3300.000	7.36	7.36	2.50	60.04	10.96	0.68	40.89	75%
EU-007 (Chemlok 7701)	7.6	97.10%	0.0%	97.1%	0.0%	2.00%	0.00018	1600.000	7.36	7.36	2.12	50.87	9.28	0.07	368.01	75%
EU-007 (Chemlok EP5666-	8.3	61.30%	0.0%	61.3%	0.0%	30.90%	0.00020	1600.000	5.06	5.06	1.62	38.84	7.09	1.12	16.37	75%
EU-010 (Chemlok 205)	7.5	82.99%	0.0%	83.0%	0.0%	9.17%	0.00027	4000.000	6.21	6.21	6.70	160.90	29.36	0.00	67.70	100%
EU-010 (Chemlok 220)	8.7	79.90%	0.0%	79.9%	0.0%	13.12%	0.00018	4000.000	6.94	6.94	5.00	119.98	21.90	0.00	52.92	100%
EU-012 (6887-35 Adhesive)	7.8	83.52%	0.0%	83.5%	0.0%	9.57%	0.00024	3000.000	6.53	6.53	4.70	112.86	20.60	0.00	68.25	100%
EU-013 (Chemlok 205)	7.4	85.50%	0.0%	85.5%	0.0%	7.30%	0.00046	400.000	6.28	6.28	1.16	27.87	5.09	0.22	86.09	75%
EU-013 (Chemlok 220)	8.3	83.60%	0.0%	83.6%	0.0%	50.00%	0.00050	400.000	6.97	6.97	1.39	33.27	6.07	0.30	13.94	75%
EU-015 (Chemlok 205)	7.3	87.70%	0.0%	87.7%	0.0%	6.20%	0.00065	174.000	6.36	6.36	0.72	17.26	3.15	0.00	102.55	100%
EU-015 (Chemlok 220)	8.2	86.00%	0.0%	86.0%	0.0%	43.40%	0.00113	174.000	7.05	7.05	1.39	33.28	6.07	0.00	16.25	100%
EU-016 (Chemlok 205)	7.3	87.70%	0.0%	87.7%	0.0%	6.20%	0.00065	174.000	6.36	6.36	0.72	17.26	3.15	0.00	102.55	100%
EU-016 (Chemlok 220)	8.2	86.00%	0.0%	86.0%	0.0%	43.40%	0.00113	174.000	7.05	7.05	1.39	33.28	6.07	0.00	16.25	100%
EU-017 (Chemlok 205)	7.3	87.70%	0.0%	87.7%	0.0%	6.20%	0.00045	448.000	6.36	6.36	1.28	30.76	5.61	0.20	102.55	75%
EU-017 (Chemlok 220)	8.2	86.00%	0.0%	86.0%	0.0%	41.70%	0.00070	448.000	7.02	7.02	2.20	52.82	9.64	0.39	16.83	75%
EU-018 (Akzo 4AMW44770)	8.8	75.80%	51.7%	24.1%	54.0%	29.00%	0.00024	400.000	4.59	2.11	0.20	4.80	0.88	0.00	7.28	100%
EU-019 (Chemlok 205)	7.3	87.70%	0.0%	87.7%	0.0%	6.20%	0.00045	174.000	6.36	6.36	0.50	11.95	2.18	0.08	102.55	75%
EU-019 (Chemlok 220)	8.2	86.00%	0.0%	86.0%	0.0%	41.70%	0.00070	174.000	7.02	7.02	0.85	20.51	3.74	0.15	16.83	75%
EU-020 (Akzo 4AMW44770)	8.8	75.80%	51.7%	24.1%	54.0%	29.00%	0.00024	400.000	4.59	2.11	0.20	4.80	0.88	0.00	7.28	100%
EU-022 (Chemlok 205)	7.4	85.50%	0.0%	85.5%	0.0%	7.30%	0.00046	400.000	6.28	6.28	1.16	27.87	5.09	0.22	86.09	75%
EU-022 (Chemlok 220)	8.3	83.60%	0.0%	83.6%	0.0%	50.00%	0.00050	400.000	6.97	6.97	1.39	33.27	6.07	0.30	13.94	75%
EU-024 (Akzo 4AMW44770)	8.8	75.80%	51.7%	24.1%	54.0%	29.00%	0.00024	400.000	4.59	2.11	0.20	4.80	0.88	0.44	7.28	50%

**State Potential Emissions**

**Add worst case coating to all solvents**

**79.89**

**1917.40**

**349.93**

**18.30**

**METHODOLOGY**

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \* (8760 hrs/yr) \* (1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used